### No. 03-20-00129-CV

## IN THE THIRD COURT OF APPEALS AUSTIN, TEXAS

# QATAR FOUNDATION FOR EDUCATION, SCIENCE AND COMMUNITY DEVELOPMENT, Appellant,

v.

# KEN PAXTON, TEXAS ATTORNEY GENERAL AND ZACHOR LEGAL INSTITUTE, Appellees.

On Appeal from the 200th Judicial District Court of Travis County, Texas, Cause No. D-1-GN-18-006240

## UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME TO FILE BRIEF OF APPELLANT

Appellant Qatar Foundation for Education, Science and Community Development respectfully files this Unopposed First Motion for Extension of Time to File Brief of Appellant. The current deadline for filing the brief is **April 9, 2020**. Appellant requests a **30-day extension** of time for a new deadline of **May 11, 2020**.

The reasons for this request are the following, which have precluded counsel from timely filing this brief:

- 1. preparation of response to appellee's suggestion of mootness and motion for costs in *Hanson Aggregates, LLC, et al. v John Earl Ellisor*, No. 14-20-00011-CV, in the Fourteenth Court of Appeals, filed March 31, 2020;
- 2. preparation of petition for review in *Allstate Fire and Cas. Ins. Co. and Allstate Ins. Co. v. Jesus Inclan*, in the Supreme Court of Texas, due April 8, 2020;
- 3. assistance with preparation for oral argument in *W&T Offshore, Inc. v. Wesley Fredieu*, No. 18-1134, in the Supreme Court of Texas, to be held on April 8, 2020; and
- 4. preparation of reply brief of appellant in Austin Trust Co. as Trustee of the Bob and Elizabeth Lanier Descendants Trusts for Robert Clayton Lanier, Jr., et al. v. Jay Houren, as Independent Executor of the Estate of Robert C. Lanier, Deceased, in the Fourteenth Court of Appeals, due April 29, 2020.

This request is also made due to the COVID-19 outbreak and the attendant need for working remotely and other logistical challenges.

This extension is not sought for the purposes of delay. No prior extension has been granted for this deadline.

As set forth in the Certificate of Conference below, this motion for extension of time is unopposed.

For these reasons, Appellant respectfully requests that its Unopposed First Motion for Extension of Time be granted and that the due date for Appellant's Brief of Appellant be extended 30 days to May 11, 2020.

### Respectfully submitted,

/s/ Wallace B. Jefferson Wallace B. Jefferson State Bar No. 00000019 wjefferson@adjtlaw.com Anna M. Baker State Bar No. 00791362 abaker@aditlaw.com ALEXANDER DUBOSE & JEFFERSON LLP 515 Congress Avenue, Suite 2350 Austin, Texas 78701-3562 Telephone: (512) 482-9300

Facsimile: (512) 482-9303

D. Patrick Long State Bar No. 12515500 patrick.long@squirepb.com SQUIRE PATTON BOGGS (US) LLP 2000 McKinney Avenue, Suite 1700 Dallas, Texas 75201 Telephone: (214) 758-1505 Facsimile: (214) 758-1550

Amanda D. Price State Bar No. 24060935 amanda.price@squirepb.com SQUIRE PATTON BOGGS (US) LLP 6200 Chase Tower 600 Travis Street Houston, Texas 77002 Telephone: (713) 546-5850

Facsimile: (713) 546-5830

### ATTORNEYS FOR APPELLANT

### **CERTIFICATE OF CONFERENCE**

I certify that on April 6, 2020, I conferred with Jennifer Riggs, counsel for Appellee Zachor Legal Institute, and with Kimberly Fuchs, counsel for Appellee Ken Paxton, Texas Attorney General, and each stated that her client does not oppose the relief sought in this motion for extension of time.

/s/ Anna M. Baker Anna M. Baker

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 6, 2020, a true and correct copy of this motion, including any and all attachments, is served via electronic service through eFile.TXCourts.gov on parties through counsel of record, listed below:

Kimberly L. Fuchs State Bar No. 24044140 kimberly.fuschs@oag.texas.gov Assistant Attorney General Open Records Litigation P.O. Box 12548, Capitol Station Austin, Texas 78711-2548 Jennifer Scott Riggs State Bar No. 16922300 jriggs@r-alaw.com RIGGS & RAY, P.C. 506 West 14th Street, Suite A Austin, Texas 78701 Telephone: (512) 457-9806

Facsimile: (512) 457-9806

/s/ Anna M. Baker Anna M. Baker